

FC-4776

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UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
HONORABLE MORRIS STERN  
CASE NO. 03-26565 (MS)

In the Matter of:

Chapter 11

JAZZ PHOTO CORP.,

### Debtor-in-Possession.

**NOTICE OF DEBTOR'S MOTION FOR  
ENTRY OF AN ORDER EXTENDING FOR  
ONE HUNDRED TWENTY (120) DAYS  
THE TIME BY WHICH THE DEBTOR  
MUST ASSUME OR REJECT ITS  
UNEXPIRED LEASE OF NON-  
RESIDENTIAL REAL PROPERTY  
PURSUANT TO 11 U.S.C. § 365(d)(4)**

**HEARING DATE AND TIME:**

July 14, 2003 at \_\_:\_\_.m.

**ORAL ARGUMENT WAIVED UNLESS  
OBJECTIONS TIMELY FILED**

TO: All Parties-in-Interest  
on the Attached Service List

PLEASE TAKE NOTICE that on July 14, 2003 at \_\_:\_\_\_.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for Jazz Photo Corp., the within debtor and debtor-in-possession (the "Debtor"), shall move before the Honorable Morris Stern, U.S.B.J., at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building and Court House, 50 Walnut Street, Third Floor, Newark, New Jersey 07102, for an Order extending the time within which the Debtor must assume or reject its non-residential real property lease pursuant to 11 U.S.C. § 365(d)(4) for a period of approximately one hundred twenty (120) days ("Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal basis upon which the relief requested should be granted. Also submitted herewith is a proposed Order granting the relief requested by the Debtor.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court, and a copy simultaneously served on counsel for the Debtor, Cole, Schotz, Meisel, Forman & Leonard, P.A., Court Plaza North, 25 Main Street, P.O. Box 800, Hackensack, New Jersey 07602-0800 (Attention: Warren A. Usatine, Esq.) so that same is received no later than seven (7) days before the return date set forth above.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel waives oral argument on the return date of the Motion unless objections to the relief requested are timely filed and served.

COLE, SCHOTZ, MEISEL,  
FORMAN & LEONARD, P.A.  
Attorneys for Jazz Photo Corp., Debtor-in-  
Possession

By: /s/ Franck D. Chantayan  
Franck D. Chantayan

DATED: June 24, 2003